

1 THE HONORABLE RICHARD A. JONES
2
3
4
5
6

7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 ABDIQAFAR WAGAFE, *et al.*, on behalf
11 of themselves and others similarly situated,

12 Plaintiffs,

13 v.
14

DONALD TRUMP, President of the
United States, *et al.*,

15 Defendants.

No. 17-cv-00094 RAJ

**SUPPLEMENTAL DECLARATION OF
STACY TOLCHIN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
SANCTIONS**

I, Stacy Tolchin, hereby declare:

1. I have personal knowledge of the facts stated below and am competent to testify
regarding them.

2. My background and experience as an attorney was set forth in the Declaration of
Stacy Tolchin in Support of Plaintiffs' Motion for Class Certification (Dkt. 32) and Declaration
of Stacy Tolchin in Support of Plaintiffs' Motion for Sanctions (Dkt. 144).

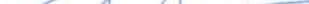
3. My office engages in contemporaneous time entries for all our cases.

4. I reviewed the time records attributed to the *Wagafe* litigation using our
“Clicktime” software. I certify that the time records accurately reflect the time I spent on
preparing Plaintiffs' Motion for Sanctions. Attached as **Exhibit A** is a copy of my time records
for the work associated with Plaintiffs' Motion for Sanctions.

1 5. The hourly rate of the work performed is \$676.85 for 2018, based on my year of
2 graduation and the market rates for Seattle, Washington. *See Declaration of Carol Sobel in*
3 *Support of Plaintiffs' Motion for Sanctions (Dkt. 138).*

4 6. Below is a chart that details the attorneys' fees that I am seeking for my work on
5 Plaintiffs' Motion for Sanctions. The total value of my work is \$ 3,722.68.

| | Time and Rate |
|--|---------------------------|
| Preparing Plaintiffs' Motion for Sanctions | 5.5 hours x \$676.85 rate |
| TOTAL | \$3,722.68 |

I declare under penalty of perjury that the foregoing is true and correct. Executed in Los Angeles California on March 7, 2019. 

Stacy Tolchin

Law Offices of Stacy Tolchin
634 S. Spring St. Suite 500A
Los Angeles, CA 90014
Telephone: (213) 622-7450
Facsimile: (213) 622-7233
Stacy@tolchinimmigration.com

CERTIFICATE OF SERVICE

I certify that on the date indicated below, I caused service of the foregoing document via the CM/ECF system, which will automatically send notice of such filing to all counsel of record.

DATED this 13th day of March, 2019, at Seattle, Washington.

s/ Cristina Sepe
Cristina Sepe, WSBA No. 53609
Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: 206.359.8000
Facsimile: 206.359.9000
Email: CSupe@perkinscoie.com

EXHIBIT A

| Person | Job | Date | Comment | Hours |
|---------------|-----|-----------|---|-------------|
| Stacy Tolchin | | | | |
| | | 3/7/2018 | call with team re discovery and sanctions motions | 0.70 |
| | | 3/16/2018 | review of motion for oversized draft | 0.20 |
| | | 3/20/2018 | sanctions declaration | 0.70 |
| | | 3/21/2018 | call re motion for sanctions | 0.60 |
| | | 3/21/2018 | review of motion for sanctions | 1.10 |
| | | 3/27/2018 | declaration and fees for motion | 0.50 |
| | | 3/27/2018 | call re motion for sanctions | 0.60 |
| | | 4/10/2018 | review of opp | 0.20 |
| | | 4/10/2018 | call re reply on motions for sanctions | 0.50 |
| | | 4/12/2018 | review of reply | 0.40 |
| | | | | 6.20 |
| | | | Grand Total | 5.50 |